1

Witten berg University Policy

Con flict o f Interest – Spon sored Proj ects

It is the policy of Wittenberg University to abide by the National Science Foundation (NSF), the

Department of Health and Human S ervices , Office of Pub lic Health S ervices (PHS) , and other f ederal

funding agencies with regards to the Financial Conflict of Interest Policy. The Policy is designed to comply

with federal regulations (42 CFR 50 and 45 CFR 94). Specifically , this p olicy applies to spons ored -research

(def ined below) projects f or which Wittenb erg University submits a proposal to, or receives r esearch

funding from the NSF, PHS, or other agencies. The purpose of this policy is to protect the credibility and

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sponsored projects activities is ens ured.

This policy applies to all Inves tigators (defined below) of the University who are involved with f unded

research. The Pr ovost is respons ible for ensuring implementation of this policy and may sus pend all

relevant activities until any financial conf licts of interest are resolved or other action deemed appropriate

by the Provost is implemented. Violation of any part of these policies may constitute cause for

disciplinary or other administrative action pursuant to Univers ity policy.

A. Disclosure of Significant Financial Interests.

2

includes any stock, stock option, or other ownership interest, as determined
through reference to public prices or other reasonable measures of fair market
value.
iii. With regard to any non-publicly traded entity, a Significant Financial Interest
exists if the value of any remuneration received from the entity in the twelve
months preceding the disclosure, when aggregated, exceeds $5,000, or when the

4

f ailure to comply with this policy to determ ine whether the r es earch conducted dur ing the period of non -

comp liance was bias ed in the des ign, conduct, or reporting of research.

The University shall strive to maintain the confidentiality of all financial disclosures; however, such

disclosures may be subject to government audit, cour t s ubp oena, or other legally required disclosure.

G. Records. The Provost (or Provost-designee) shall maintain records of all financial disclosures and of all